

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MARNEY DURANJACOME,)	
)	C.A. No: 06-186 JJF
Plaintiff,)	
)	
v.)	NON-ARBITRATION CASE
)	
NATASHA JOYNES and RHONDA)	JURY TRIAL DEMANDED
REYNOLDS,)	
)	
Defendants.)	

ANSWER

1. Defendant is without sufficient knowledge to admit or deny the allegation.
2. Denied.
3. Denied.
4. Defendants repeat and incorporate by reference paragraphs 1 through 3.
5. Denied.
6. Admitted.
7. Admitted a collision occurred at the time date and place alleged. The remaining allegations are denied.
8. Denied.

COUNT I

9. Defendants repeat and incorporate by reference paragraphs 1 through 8.
10. Denied.

COUNT II

- 11. Defendants repeat and incorporate by reference paragraphs 1 through 8.
- 12. Admitted.
- 13. Denied.
- 14. Denied.
- 15. Denied.
- 16. Denied.
- 17. Denied.

COUNT III

- 18. Defendants repeat and incorporate by reference paragraphs 1 through 8.
- 19. Denied.
- 20. Denied.
- 21. Denied.
- 22. Denied.

WHEREFORE, Defendants demand judgment against Plaintiff plus costs.

FIRST AFFIRMATIVE DEFENSE

- 23. The accident which is the subject of this lawsuit was unavoidable.

WHEREFORE, Defendants demand judgment against Plaintiff plus costs.

SECOND AFFIRMATIVE DEFENSE

- 24 Defendant was reacting to an emergency situation and acted reasonably at all times given the conditions as they then existed.

WHEREFORE, Defendants demand judgment against Plaintiff plus costs.

THIRD AFFIRMATIVE DEFENSE

25. Plaintiff fails to state a claim upon which relief can be granted as to paragraphs 10(m) and 17.

WHEREFORE, Defendants demand judgment against Plaintiff plus costs.

REGER RIZZO KAVULICH & DARNALL LLP

By: /s/ Arthur D. Kuhl, Esquire
Arthur D. Kuhl, Esquire #3405
1001 Jefferson Street Plaza, Suite 202
Wilmington DE 19801
302-652-3611
Attorney for Defendants

Dated: June 20, 2006

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MARNEY DURANJACOME,)	
)	C.A. No: 06-186 JJF
Plaintiff,)	
)	
v.)	NON-ARBITRATION CASE
)	
NATASHA JOYNES and RHONDA)	JURY TRIAL DEMANDED
REYNOLDS,)	
)	
Defendants.)	

NOTICE OF SERVICE

I certify that I have caused copies of the foregoing Answer to be served by e-filing on June 20, 2006 upon:

Matthew R. Fogg, Esquire
Doroshow Pasquale Krawitz & Bhaya
1202 Kirkwood Highway
Wilmington De 19805
Attorney for Plaintiff
302-998-0100

REGER, RIZZO, KAVULICH & DARNALL,
LLP

By: /s/ Arthur D. Kuhl, Esquire
Arthur D. Kuhl, Esquire, # 3405
1001 Jefferson Street
Suite 202
Wilmington DE 19801
302-652-3611
Attorney for Defendants